

REMARKS

Claims 1-20 are currently pending in this application and shall remain pending following the entry of this response. No claims have been canceled. Claims 1, 11 and 17-20 have been amended.

Claim Objections

Claims 18-20 are objected to as they refer to “an article of” while claim 17 from which these claims depend from recites “A machine-readable storage device”. Claims 18-20 have been amended to recite “machine-readable storage device”. Applicants request withdrawal of this objection.

Claim Rejection under 35 U.S.C. § 103

Claims 1-20 are rejected under 35 USC 103(a) as being unpatentable over *Pelaez et al.* (US Patent Application Pub. No. 2004/0185836, herein after *Pelaez*), in view of *Houde et. al.* (US Patent No. 5,978,678, herein after *Houde*) and further in view of *Lozano et al.* (US Patent No. 5,982,869, hereinafter *Lozano*) and further in view of *Farber et al.* (US Publication No. 2005/0226400, herein after *Farber*).

Applicant respectfully submits that each of these references, alone or in combination, do not teach or suggest the subject matter of the rejected claims.

For example, regarding amended independent claim 1, the references do not teach, “identifying an interconnection constraint comprising at least one of a preference and a restriction relating to selection of a circuit among a plurality of circuits associated with one of the plurality of trunks associated with the first node for routing the call”. Support for such limitations can be found at least on pages 2 through 17 of the instant application.

In rejecting claim 1, the Examiner concedes that *Pelaez* does not disclose “identifying a interconnection constraint relating to selection of a circuit associated with one of the plurality of trunks associated with the first node for routing the call”. However, the Examiner refers to

Houde as teaching this missing element referring to Fig. 1, Col. 3 L 10-40, Col. 4 L 14-65 of *Houde*. More particularly, the Examiner states “**The HLR database stores information concerning the assigned subscriber mobile station 16 comprising location information and Service information refer to as interconnection constraint.** Further, *Houde* teaches that, when a call 200 is dialed to the home directory number of the internationally roaming mobile station 16(1) originates from another cellular subscriber or the public switched telephone network (PSTN) and is received at one of the switching nodes 14 (i.e., gateway node) of the first country cellular network 12 (e.g. Canada or France). The home location register 22 processes (action 204) the location request signal, in view of the previously received registration notification signal 104, **to determine the location (e.g. constraint)** (i.e., serving switching node 34 within the second country cellular network 32) of the called mobile station 16(1). The home location register 22 then signals the serving switching node 34 for the called mobile station 16(1) (over signaling links 18 and 24, through international gateway 50, and over signaling link 40) with a routing request signal 206 to route the call. This routing request signal may comprise IS-41 ROUTEREQ signal or other equivalent standardized or proprietary message. Responsive to the signal 206, the serving switching node 34 assigns (action 208) a temporary local directory number (TLDN) to the international roaming mobile station 16(1), and sends a routing request return result signal 210 including the assigned temporary local directory number to the home location register 22 via the international gateway 50. From processing of the previously stored switching node identification for switching node 34, the home location register identifies the county where the node (34) is located and retrieves (action 212) its country code (CC) designation. The country code and returned temporary local directory number are then appended to the proper international dialing access digits (IDAD) to form (action 214) the international number for contacting the called international roaming mobile station 16(1). It will be noted that if the returned temporary local directory number does not include a city code, this may also be determined from processing the switching node identification number and then appended by action 214 at the proper location to complete the international number. **It will further be noted that the subscriber owing the international roaming mobile station 16(1) may further have a long distance carrier preference, and in such instances the carrier code for that preferred**

carrier is also appended by action 214 at the proper location to complete the international number.” (Emphasis Added)

Applicant respectfully submits that the cited paragraphs from *Houde* do not disclose “identifying an interconnection constraint comprising at least one of a preference and a restriction relating to selection of a circuit among a plurality of circuits associated with one of the plurality of trunks associated with the first node for routing the call”, as recited in claim 1. The Examiner refers to “location information” and “location” as being analogous to “interconnection constraint” recited in claim 1. However, the cited paragraphs do not indicate that the location information includes a preference or restriction relating to the selection of a circuit among a plurality of circuits associated with a trunk.

Further, the cited paragraphs disclose “a long distance carrier preference”. However, the Applicants assert that “a long distance carrier preference” is not same as a preference relating to selection of a circuit among a plurality of circuits associated with a trunk. Nowhere in the cited paragraphs, does *Houde* indicate that the “long distance carrier preference” relates to selection of a circuit among a plurality of circuits associated with a trunk.

In fact, Applicants could not find any mention of “identifying an interconnection constraint comprising at least one of a preference and a restriction relating to selection of a circuit among a plurality of circuits associated with one of the plurality of trunks associated with the first node for routing the call” in *Houde*. *Lozano* and *Farber* do not overcome the shortcomings of *Houde* as stated in the above paragraphs.

Thus, none of *Pelaez*, *Houde*, *Lozano* and *Farber* teaches or suggests expressly or inherently the subject matter claimed in claim 1 as a whole. For at least these reasons, Applicants submit that claim 1 and its dependents are allowable and request withdrawal of this rejection.

Independent claims 11 and 17 recite similar elements as claim 1 not taught in the references. For at least these reasons claims 11 and 17, as well as their dependents also are allowable. Applicants request the withdrawal of rejections with respect to these claims.

CONCLUSION

For the above reasons, the foregoing amendment places the Application in condition for allowance. Therefore, it is respectfully requested that the rejection of the claims be withdrawn and full allowance granted. Should the Examiner have any further comments or suggestions, please contact Raffi Gostanian at (972) 849-1310.

Respectfully submitted,
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